

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: Jeffrey Lynn Goss  
Debtor,

JPMorgan Chase Bank, National Association  
Movant.

v.

Jeffrey Lynn Goss  
Debtor/Respondent,

Jack N. Zaharopoulos, Trustee  
Additional Respondent.

BANKRUPTCY CASE NUMBER  
18-04257/MJC

CHAPTER 13

**RESPONSE OF JPMORGAN CHASE BANK, NATIONAL ASSOCIATION TO  
DEBTOR'S MOTION FOR APPROVAL OF THE SALE OF CERTAIN PROPERTY**

JPMorgan Chase Bank, National Association, by and through its counsel, LOGS Legal Group LLP, hereby responds to Debtor's Motion for Approval of the Sale of Certain Property, and in support thereof, states does not oppose a sale of the subject real property, Movant would request that any order regarding the sale of the subject property include language that JPMorgan Chase Bank, National Association will be paid in full at closing, by the title company, pursuant to a proper payoff statement, and that any short-sale must be approved by Movant.

/s/ Kristen D. Little

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Christopher A. DeNardo 78447  
Kristen D. Little 79992  
LOGS Legal Group LLP  
3600 Horizon Drive, Suite 150  
King of Prussia, PA 19406  
(610) 278-6800  
logsecf@logs.com

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**CERTIFICATE OF SERVICE**

I, Kristen D. Little , an employee of the law firm of LOGS Legal Group LLP hereby certify that I caused to be served true and correct copies of the foregoing by First Class Mail, postage prepaid, at the respective last known address of each person set forth below on this December 9, 2021 :

Jeffrey Lynn Goss  
PO Box 17  
State College, PA 16804

Kara Katherine Gendron, Esquire  
Mott & Gendron Law  
125 State Street  
Harrisburg, PA 17101  
karagendronecf@gmail.com - VIA ECF

Jack N. Zaharopoulos, Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
dehartstaff@pamd13trustee.com - VIA ECF

I HEREBY CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS  
TRUE AND CORRECT.

/s/ Kristen D. Little

Christopher A. DeNardo 78447

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**ORDER**

AND NOW, this \_\_\_\_\_ day of \_\_\_\_\_, 2021, upon consideration of the Motion for Approval of the Sale of Certain Property and Respondent's response thereto;

It is hereby ORDERED that Motion for Approval of the Sale of Certain Property is GRANTED so long as:

1. The outstanding mortgage owed to JPMorgan Chase Bank on the property located at 373 Tow Hill Road, Port Matilda, Pennsylvania is paid in full; and
2. Should the proposed transaction not pay JPMorgan Chase Bank in full, that transaction needs to be approved by JPMorgan Chase Bank prior to settlement.

BY THE COURT:

\_\_\_\_\_  
HONORABLE MARK J CONWAY  
UNITED STATES BANKRUPTCY JUDGE